



September 17, 2013

Craig Foss  
Chief, Bureau of Forestry Assistance  
Idaho Department of Lands  
PO Box 83720 Boise, Idaho 83720  
cfoss@idl.idaho.gov

In re: Comments on Idaho Forest Practices Act Proposed Rule – DOCKET NO. 20-0201-01301

Dear Mr. Foss:

These comments are submitted by Jim Riley of Riley and Associates in support of the proposed Idaho Forest Practices Act rule - DOCKET NO. 20-0201-01301.

Riley and Associates is a consulting firm providing forestry and public policy expertise to its clients that include several landowners with various sizes of forest properties in Idaho, primarily managed for commercial forestry under the forest stewardship principles. Riley and Associates President, Jim Riley, is a professional forester and has over 25 years of direct experience with forest management and forest policy in Idaho.

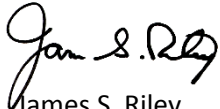
The proposed rule is the result of extensive public comment and input and, in our professional assessment, is soundly based on the best available scientific data and information about forest riparian areas. Riley and Associates has closely followed and participated in the negotiated rule-making and the deliberations of the Idaho Forest Practices Advisory Committee which led to this proposed rule. The process was thorough and the science is sound. No rule is perfect in the complex natural environment but this proposal is as good as possible given the current information and scientific understanding of forest riparian zones. It provides both for the protection of water quality and fish habitat, and the opportunity for forests to be managed to meet landowner objectives.

The proposed rule is highly commendable in that it provides options to landowners. Each option provides the same high level of protection for streams and water quality, but very different opportunities for landowners with differing forest conditions and differing land management objectives. The proposed rule allows individual landowners to select the riparian protection program that best suits their individual requirements. This is innovative and commendably responsive to differing landowner values and objectives.

Riley and Associates supports this rule with the understanding that the Idaho Department of Lands will continue its dedication to carefully monitoring forest management programs in Idaho and evaluating new science as it becomes available. The Department's dedication to the goal of continuous improvement in providing flexibility for private landowners and protecting the sustainability of the forest soils and water is admirable.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "James S. Riley". The signature is fluid and cursive, with the first name "James" and last name "Riley" clearly distinguishable.

James S. Riley  
President